

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|--------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 4:18CR00768-01 |
| |) | |
| MALACHIAH WILLIAMS, |) | |
| |) | |
| Defendant. |) | |

SENTENCING MEMORANDUM

COMES NOW Defendant and in support of his Motion states as follows:

As stated in the plea agreement “both parties are making a joint recommendation to 15 years custody.” ¶ 2 of the PSR. While Defendant is of course bound to this request for 15 years, Defendant does wish to point out that he did witness domestic violence as a child and grew up in broken home with him living at some times in vacant buildings. See ¶ 63 of the PSR. Defendant has not spoken to his mother since October 2018. Id. Further, Defendant began smoking marijuana at age 12 and has continually smoked marijuana until his arrest in the instant case. ¶ 73. Finally, Defendant was the victim of a violent crime himself and his finger was amputated after a gunshot wound – Defendant still suffers physically and emotionally from this violent attack. ¶ 71.

WHEREFORE, Defendant asks that he be sentenced to a term of imprisonment consistent with the plea agreement. Additionally, Defendant asks that he be placed into a drug treatment program with the Bureau of Prisons to provide him with appropriate treatment of his drug addiction (18 U.S.C. § 3553(a)(2)(D)). Finally, Defendant asks that any term of imprisonment run concurrent to any term of imprisonment assessed in St.

Case # 1422-CR0659-01 and concurrent to any term of imprisonment in Case # 1922-CR00844-01. See paragraphs 94 and 95 in the PSR. Defendant asks that he be placed in a facility as close as possible to St. Louis Missouri to facilitate visits by his children and family.

Respectfully submitted,

/s/ Craig J. Concannon

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the Office of the United States Attorney this 22nd day of July, 2019 via operation of the Court's Electronic Filing System.

/s/ Craig J. Concannon
